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SARA QUINTANA

**U.S. DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

SARA QUINTANA,

Plaintiff,

vs.

CASE NO. 2:21-cv-00023-CDS-NJK

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
and the BOARD OF TRUSTEES OF THE
CLARK COUNTY SCHOOL DISTRICT, in
their official capacities,

Defendants.

**STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR RESPONSE AND
REPLY TO DISPOSITIVE MOTION (FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiff SARA QUINTANA, through her attorneys JAMES P. KEMP, ESQ. of the law firm of KEMP & KEMP and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW, P.C.; and by Defendants CLARK COUNTY SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY SCHOOL DISTRICT (BOT) through their attorneys WALTER R. CANNON, ESQ. and

1 STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON GORMLEY &
2 STOBERSKI, and CRYSTAL J. HERRERA, ESQ. of the OFFICE OF THE GENERAL COUNSEL
3 FOR THE CLARK COUNTY SCHOOL DISTRICT, that the deadline for filing a response to
4 dispositive motions and for filing a reply to a response to dispositive motions in this matter be
5 extended for twenty-one (21) days. This is the parties FIRST post-discovery request for extension of
6 the respective response and reply deadlines, submitted for the below-stated reasons.
7

8 On November 4, 2022, Defendants filed Defendants' Motion for Summary Judgment. (ECF
9 No. 57). The deadline for Plaintiff to file and serve a response to Defendants' Motion falls on
10 November 25, 2022, which is twenty-one (21) days after service of Defendants' Motion. *See* LR 7-
11 2(b).
12

13 The parties now enter into this first Stipulation to extend the deadline for a response to
14 Defendants' Motion and for a reply to any filed response by twenty-one (21) days. Attorney Kemp,
15 Plaintiff's counsel, who was in trial during the week of November 7, 2022, will be out of the office
16 from November 16-18, November 21-25, and November 30 through December 2, 2022. Additionally,
17 Attorney Hill, Plaintiff's counsel, will be out of the office November 24-25, 2022, because his office
18 is closed on those days, and at least some of his support staff will likely be out of the office the week
19 of Thanksgiving (November 21-25, 2022). With the requested extension, the deadline for filing any
20 reply would fall on December 30, 2022, which is the week following the Christmas holiday and
21 leading up to the New Year's holiday. *See* LR 7-2(b). As such, the parties respectfully requests that
22 the deadline for filing a response to Defendants' Motion be extended until December 16, 2022, and
23 the deadline for filing a reply to any filed response be extended an additional fourteen (14) days until
24 January 13, 2023.
25

26 ///
27
28

Accordingly, the parties hereby stipulate to extend the current response deadline of November 25, 2022, to December 16, 2022, and the reply deadline of December 30, 2022, resulting from the extended response deadline, to January 13, 2023. This is the parties' FIRST stipulation concerning the deadline for responses to dispositive motions and replies to said responses.

RESPECTFULLY SUBMITTED,

DATED this 16th day of November, 2022.

KEMP & KEMP

/s/ James A. Hill

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DATED this 16th day of November, 2022.

OLSON CANNON GORMLEY & STOBERSKI

/s/ Stephanie Barker

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Attorneys for Defendants

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: November 21, 2022

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